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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GLOBAL CONNECT, LLC, a Nevada limited
liability company,

Plaintiff,

v.

TECHRADIUM, INC, a Texas corporation

Defendant.

Case No.

**COMPLAINT FOR DECLARATORY
JUDGMENT OF NON-INFRINGEMENT
AND PATENT INVALIDITY**

Plaintiff, Global Connect, LLC, ("Global" or "Plaintiff"), by and through its attorneys makes and files this Complaint against Defendant, TechRadium, Inc., ("TechRadium" and "Defendant"); and hereby alleges and demands a jury trial.

THE PARTIES

1. Global is a corporation formed under the laws of Nevada with its principal place of business in Mays Landing, New Jersey.

2. TechRadium is a corporation formed under the laws of Texas with its principal place of business in Sugar Land, Texas.

3. TechRadium is in the business of mass notification and emergency and alerting systems to governmental, educational, commercial and non-profit entities throughout the United States. TechRadium's technology is purportedly subject to numerous patents and marketed under the tradename IRIS™ ("Immediate Response Information System).

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12. Defendant first sued Twitter, Inc. on or about August 4, 2009 claiming that Twitter infringed the '389, '183 and '165 Patents. The lawsuit was filed in the Southern District of Texas and assigned case number 4:09-cv-02490.

13. On or about September 14, 2009, Defendant filed a separate action against AtHot, Inc., BroadBlast, Inc., Edulink Systems, Inc., First Call Network, Inc., GroupCast, LLC, Parlant Technology, Inc., Reliance Communications, Inc., Saf-T-Net, Inc., SWN Communications Inc., SwiftReach Networks, Inc., Twenty-First Century Communications, Inc., claiming that the multiple defendants infringed the '389, '183 and '165 Patents. The lawsuit was filed in the Eastern District of Texas and assigned case number 2:09-cv-00275.

14. On or about October 7, 2009 a representative of ADT Security Services contacted Global via telephone and accused it of infringing TechRadium's patents and indicating that TechRadium was going to be enforcing TechRadium's patents against Global. On information and belief, ADT Security Systems is a partner of TechRadium. Although not specified, Global believes the accusation is related to at least the '389, '183 and '165 Patents which TechRadium has recently begun to aggressively enforce against third parties in the mass communications industry.

15. Prior to being contacted by the representative of ADT Security Systems, Global was awarded a job based on winning a bid process for providing a Community Notification System for Atlantic County in New Jersey. TechRadium was also involved in the bid process but was beaten out by Global. Global believes losing the aforementioned job to Global has motivated TechRadium to aggressively pursue and threaten Global with patent infringement.

16. TechRadium's job loss to Global in the bid process, the threat of patent infringement litigation by TechRadium's partner ADT Security Systems, and TechRadium's recent aggressive litigation tactics to enforce the '389, '183 and '165 Patents, creates a substantial case and controversy or sufficient immediacy and reality between Global and TechRadium to warrant the grant of declaratory relief.

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DECLARATORY JUDGMENT COUNT ONE

NON-INFRINGEMENT OF U.S. PATENT NO. 7,130,389

17. The allegations set forth in paragraphs 1-16 are incorporated herein by reference.

18. A case and controversy exists between Global and Defendant concerning the Defendant's '389 Patent, which requires a declaration of rights by the Court.

19. The use of Global's mass communication system in the United States does not infringe, contributorily infringe, nor constitute inducement of infringement of any valid claim of the '389 Patent.

20. Global is entitled to a declaratory judgment that it has not infringed and it is not now infringing, has not contributorily infringed and is not now contributorily infringing, and has not induced and is not now inducing infringement or any valid claim of the '389 Patent.

DECLARATORY JUDGMENT COUNT TWO

NON-INFRINGEMENT OF U.S. PATENT NO. 7,496,183

21. The allegations set forth in paragraphs 1-20 are incorporated herein by reference.

22. A case and controversy exists between Global and Defendant concerning the Defendant's '183 Patent, which requires a declaration of rights by the Court.

23. The use of Global's mass communication system in the United States does not infringe, contributorily infringe, nor constitute inducement of infringement of any valid claim of the '183 Patent.

24. Global is entitled to a declaratory judgment that it has not infringed and it is not now infringing, has not contributorily infringed and is not now contributorily infringing, and has not induced and is not now inducing infringement or any valid claim of the '183 Patent.

DECLARATORY JUDGMENT COUNT THREE

NON-INFRINGEMENT OF U.S. PATENT NO. 7,519,165

25. The allegations set forth in paragraphs 1-24 are incorporated herein by reference.

26. A case and controversy exists between Global and Defendant concerning the Defendant's '165 Patent, which requires a declaration of rights by the Court.

1 27. The use of Global's mass communication system in the United States does not
2 infringe, contributorily infringe, nor constitute inducement of infringement of any valid claim of the
3 '165 Patent.

4 28. Global is entitled to a declaratory judgment that it has not infringed and it is not now
5 infringing, has not contributorily infringed and is not now contributorily infringing, and has not
6 induced and is not now inducing infringement or any valid claim of the '165 Patent.

7 **DECLARATORY JUDGMENT COUNT FOUR**

8 **NON-INFRINGEMENT OF U.S. PATENT NO. 7,130,389**

9 29. The allegations set forth in paragraphs 1-28 are incorporated herein by reference.

10 30. There is an actual, substantial and justiciable controversy between Global and
11 Defendant concerning the invalidity of Defendant's '165 Patent, which requires a declaration of
12 rights by the Court.

13 31. The '165 Patent is invalid because the purported invention claimed therein fails to
14 meet the conditions of patentability set forth in 35 U.S.C. §101, §102, §103 and/or §112.

15 32. Global is entitled to a declaratory judgment that the claims of the '165 Patent are
16 invalid.

17 **DECLARATORY JUDGMENT COUNT FIVE**

18 **NON-INFRINGEMENT OF U.S. PATENT NO. 7,496,183**

19 33. The allegations set forth in paragraphs 1-32 are incorporated herein by reference.

20 34. There is an actual, substantial and justiciable controversy between Global and
21 Defendant concerning the invalidity of Defendant's '183 Patent, which requires a declaration of
22 rights by the Court.

23 35. The '183 Patent is invalid because the purported invention claimed therein fails to
24 meet the conditions of patentability set forth in 35 U.S.C. §101, §102, §103 and/or §112.

25 36. Global is entitled to a declaratory judgment that the claims of the '183 Patent are
26 invalid.

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DECLARATORY JUDGMENT COUNT SIX

NON-INFRINGEMENT OF U.S. PATENT NO. 7,519,165

37. The allegations set forth in paragraphs 1-36 are incorporated herein by reference.

38. There is an actual, substantial and justiciable controversy between Global and Defendant concerning the invalidity of Defendant's '165 Patent, which requires a declaration of rights by the Court.

39. The '165 Patent is invalid because the purported invention claimed therein fails to meet the conditions of patentability set forth in 35 U.S.C. §101, §102, §103 and/or §112.

40. Global is entitled to a declaratory judgment that the claims of the '165 Patent are invalid.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that the Court enter declaratory judgment, relief and Order against Defendant as follows:

(A) A declaration that Global has not, and is not currently infringing, contributorily infringing, or inducing infringement of any valid claim of U.S. Patent No. 7,130,389;

(B) A declaration that Global has not, and is not currently infringing, contributorily infringing, or inducing infringement of any valid claim of U.S. Patent No. 7,496,183;

(C) A declaration that Global has not, and is not currently infringing, contributorily infringing, or inducing infringement of any valid claim of U.S. Patent No. 7,519,165;

(D) A declaration that the claims of U.S. Patent No. 7,130,389 are invalid;

(E) A declaration that the claims of U.S. Patent No. 7,496,183 are invalid;

(F) A declaration that the claims of U.S. Patent No. 7,519,165 are invalid;

(G) Enjoining Defendant, their officers, agents, servants, employees, representatives, successors, assigns, and any and all persons in active concert or participation with or under authority from Defendant, either separately or jointly, from asserting or enforcing U.S. Patent No. 7,130,389, or threatening the same, against Global, its related companies, successor or assigns, and/or developers, manufacturers, distributors, purchasers or users of Global's mass communication systems.

1 (H) Enjoining Defendant, their officers, agents, servants, employees, representatives,
2 successors, assigns, and any and all persons in active concert or participation with or under
3 authority from Defendant, either separately or jointly, from asserting or enforcing U.S. Patent No.
4 7,496,183, or threatening the same, against Global, its related companies, successor or assigns,
5 and/or developers, manufacturers, distributors, purchasers or users of Global's mass communication
6 systems.

7 (I) Enjoining Defendant, their officers, agents, servants, employees, representatives,
8 successors, assigns, and any and all persons in active concert or participation with or under
9 authority from Defendant, either separately or jointly, from asserting or enforcing U.S. Patent No.
10 7,519,165, or threatening the same, against Global, its related companies, successor or assigns,
11 and/or developers, manufacturers, distributors, purchasers or users of Global's mass communication
12 systems.

13 (J) Enjoining Defendant, their officers, agents, servants, employees, representatives,
14 successors, assigns, and any and all persons in active concert or participation with or under
15 authority from Defendant, either separately or jointly, from interfering with, or threatening to
16 interfere with, the manufacture, use, sale or offer of sale of Global's mass communication systems
17 by Global, its related companies, successor or assigns, and/or developers, manufacturers,
18 distributors, purchasers or users of Global's mass communication systems in connection with
19 Global's business;

20 (K) Declaring this suit exceptional under 35 U.S.C. §285 and the Plaintiff's be awarded
21 their costs, expenses and reasonable attorneys' fee; and

22 (L) Awarding such other and further relief as this Court may deem just and proper.

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JURY DEMAND

Global hereby demands a trial by jury on all issues so triable.

Respectfully submitted this 21st day of October, 2009.

GREENBERG & TRAURIG

/s/ Rob L. Phillips

Mark G Tratos (Bar No. 1086)

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